

**RECEIVED**

JAN 25 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE Western DISTRICT OF Pennsylvania  
Civil DIVISION

CLERK, U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

(Write the District and Division, if any, of  
the court in which the complaint is filed.)

Tasha Spears

(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

**-against-**

Carnegie Mellon University  
Police

(Write the full name of each defendant who is  
being sued. If the names of all the defendants  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

**Complaint for a Civil Case**

Case No. 18-109  
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Tasha Spears</u>
Street Address	<u>7227 Travella Blvd.</u>
City and County	<u>Pgh. Pa. Allegheny</u>
State and Zip Code	<u>PA. 15235</u>
Telephone Number	<u>412-695-6838</u>
E-mail Address	<u>spears.tasha1@gmail.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Carnegie Mellon University</u>
Job or Title (if known)	<u>Campus Police Officer Paul Helffich</u>
Street Address	<u>300 South Craig Street</u> <del>5000 Forbes Avenue</del>
City and County	<u>Pgh. Pa.</u>
State and Zip Code	<u>PA. 15213</u>
Telephone Number	<u>412-268-2000</u>
E-mail Address (if known)	<u>www.cmu.edu</u>

**Defendant No. 2**

Name	_____
Job or Title (if known)	_____
Street Address	_____
City and County	_____

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

(if known)

## Defendant No. 3

Name \_\_\_\_\_

Job or Title \_\_\_\_\_

(if known)

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

(if known)

## Defendant No. 4

Name \_\_\_\_\_

Job or Title \_\_\_\_\_

(if known)

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

(if known)

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

~~Race Discrimination in Violation of Title VII~~  
 TITLE III ~~Race Discrimination in Violation of Pennsylvania Human~~  
 Civil Rights Act of 1964 Relations Act  
 Desegregation of Public Facilities

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Tasha Spears, is a citizen of  
 the State of (name) Pennsylvania.

b. ~~If the plaintiff is a corporation~~

~~The plaintiff, (name) Tasha Spears, is incorporated  
 under the laws of the State of (name) Pennsylvania,  
 and has its principal place of business in the State of (name)  
Pennsylvania.~~

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
 the State of (name) \_\_\_\_\_. Or is a citizen of  
 (foreign nation) \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) Carnegie Mellon Police, is incorporated under the laws of the State of (name) Pennsylvania, and has its principal place of business in the State of (name) Pennsylvania. Or is incorporated under the laws of (foreign nation) United States, and has its principal place of business in (name) Pittsburgh Pennsylvania.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Carnegie Mellon Police knew of the violations  
4 yrs ago, contacted my attorney back then, and  
chose not to do anything about it. (Wendy Williams)  
For this reason, interest should be applied Attorney

III. Statement of Claim to the case.

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

<u>Officer Paul Hefffrich (Defendant)</u>	<u>Tasha Spears (Plaintiff)</u>
1. answered and advised me that he knew of the incident & refused to come give me a report or take my statement.	1. Called police on 2/13/13 to report assault on campus.
2. Advised me that I would be arrested & advised me to leave.	2. Advised him that I was the victim & I need help.
3. Said go somewhere else for my report.	3. Asked what should I do for a report?
4. He took a report from the white lady that was the aggressor and offered medical treatment.	4. I went to another police station to put report in.
5. Sent letter of trespass & citation for harassment in the mail.	5. went to court (found not guilty)

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am asking the courts to seek relief for the following reasons: The actions are still going on now, as I am still banned from all premises of CML and still haven't been advised in writing that this ban has been lifted. This also caused me to Not be able to seek work in or around the facility because of the

**V. Certification and Closing BANNA me.**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/25, 2018

Signature of Plaintiff

Printed Name of Plaintiff

Tasha Spears pro se  
Tasha Spears

**B. For Attorneys**

Date of signing: Jan. 25, 2018.

Signature of Attorney

\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_

Bar Number

\_\_\_\_\_

Name of Law Firm

\_\_\_\_\_

Address

\_\_\_\_\_

Telephone Number

\_\_\_\_\_

E-mail Address

\_\_\_\_\_